

# *Working with Enforcement*

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217/524-5199

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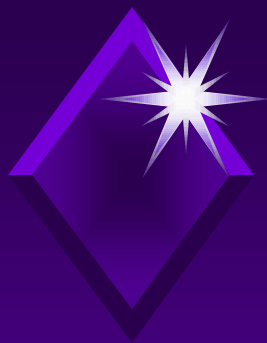
Illinois EPA

217/782-9333

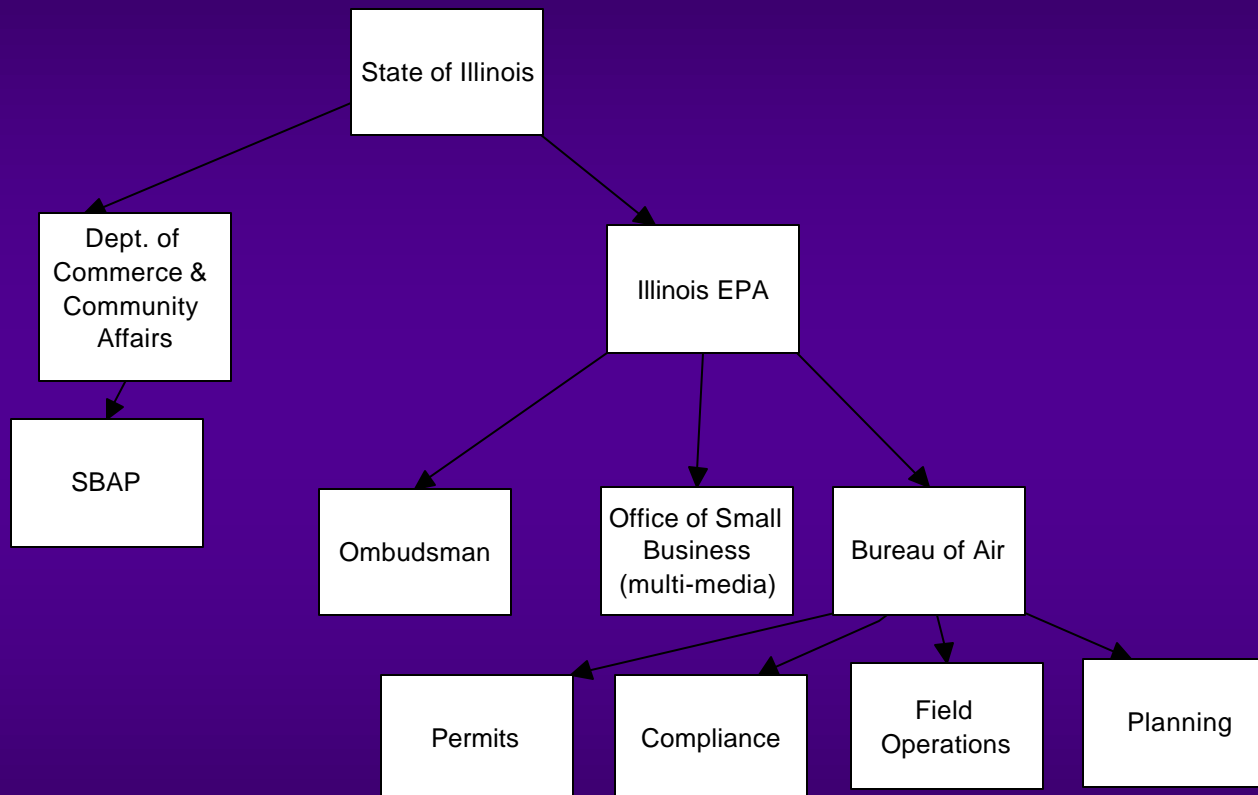


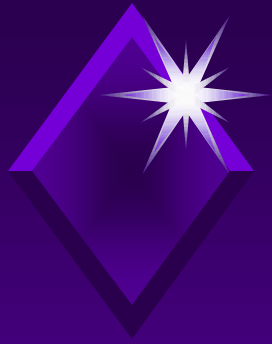
# *Introduction*

- ◆ Organization of SBAP in Illinois
- ◆ Then and now
- ◆ What the new workplan does
- ◆ Project identification
- ◆ Project examples
- ◆ Summary



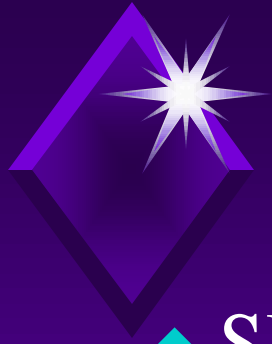
# *SBAP Organization in Illinois*





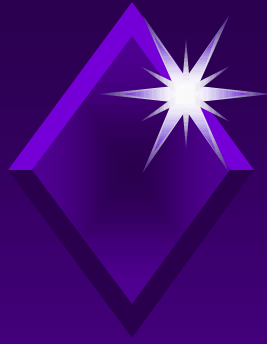
## *Then ...*

- ◆ 1992 -1997....
- ◆ Limited communication between BOA and SBAP
  - ◆ SBAP struggled to identify projects
  - ◆ IEPA Staff leery of working with DCCA
  - ◆ No formal projects designated annually
  - ◆ Limited joint projects concentrated on Industry identification for NESHAPS



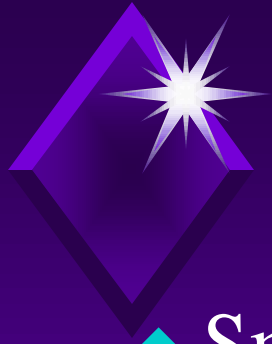
## *...and Now*

- ◆ SBAP monthly meetings w/ BOA have evolved
  - ◆ Show & tell to working meetings
  - ◆ Large disjointed group to smaller focused group
- ◆ SBAP requested more direction & detail in workplace
  - ◆ Vague Scope of Work to detailed workplan
  - ◆ Workplan is constantly changing w/ additional projects



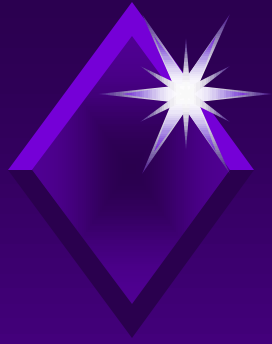
## *What the New Workplan Does for the SBAP?*

- ◆ Adds validity to our efforts
- ◆ Outlines methods of project identification
- ◆ Divides responsibility between the agencies to identify & implement projects
- ◆ Informally authorizes us to work with all sections within the BOA
- ◆ Integrates SBAP throughout the entire rule progression - (Proposed Rules to Enforcement)



## *Project Identification*

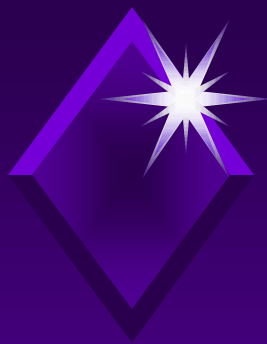
- ◆ Small Business Impact Analysis Form
  - ◆ Identifies new rules or changes
    - ◆ BOA training for staff
  - ◆ Triggers SBAP involvement in process
- ◆ Meetings w/ Section Managers of BOA
  - ◆ gives sense of ownership
  - ◆ keeps managers thinking about our program



## *Project Identification (cont.)*

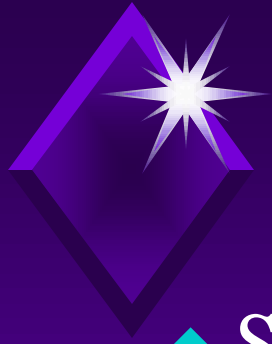
- ◆ Bi-Annual meetings with field inspectors
  - ◆ problems in field
  - ◆ update them on projects & tools
  - ◆ increase awareness of program
  - ◆ increase client referral





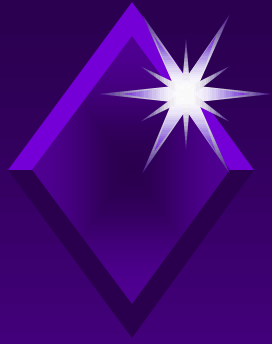
## *Project Examples*

- ◆ Hospital Medical Infectious Waste Incineration NSPS/State Rule (HMIWI)
- ◆ Clean Fuel Fleet Project (CFFP)
- ◆ Annual Emission Report Initiatives 1998 & 1999
- ◆ SBAP Language in Non Compliance Advisory Letters



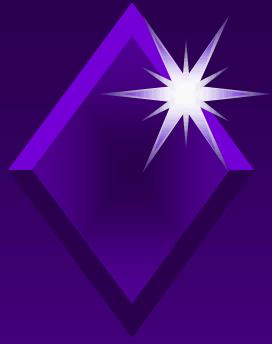
## *HMIWI Project*

- ◆ SBAP involved in rule development:
  - ◆ served on agency workgroup
  - ◆ Identified regulated universe through industry databases & trade groups
  - ◆ Hosted public outreach meetings on the proposed rule
  - ◆ Worked w/ Trade Associations for industry comment



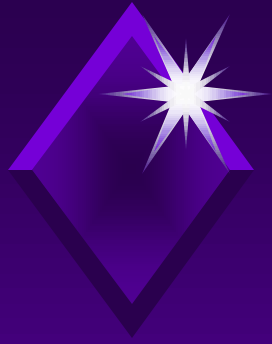
## *HMIWI Project (cont.)*

- ◆ SBAP Involved in Rule Implementation:
  - ◆ Development of multiple track approach
  - ◆ Development of initial notification forms
  - ◆ Assisted with questions for impacted small businesses



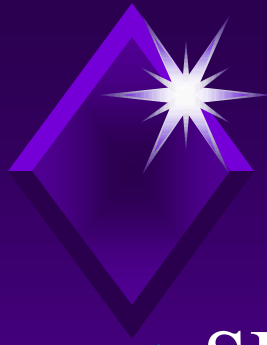
## *HMIWI Summary*

- ◆ Through this identified new projects for coming year as non-permitted incinerators were identified
- ◆ Increased respect & awareness of program by staff
- ◆ Still have problems which need to be overcome



## *Clean Fuel Fleet Program*

- ◆ Illinois identified approximately 4,000 fleets impacted in Chicago Area
- ◆ 2,000 had not responded to multiple mailings from the Illinois EPA
- ◆ Illinois EPA had exhausted all means to increase compliance w/out formal action



## *CFFP (cont.)*

- ◆ SBAP CFFP Initiatives:
  - ◆ Helped develop Factsheet
  - ◆ Good Guy/ Bad Cop Approach
  - ◆ Personalized letters to 2000 fleets indicating they were on lists for future enforcement with the Agency
  - ◆ Enclosed Registration Form & Exemption Form
  - ◆ Offered assistance to Fleets via our helpline
  - ◆ Hosted Workshops: approximately 300 trained



## *CFFP Initiative Summary*

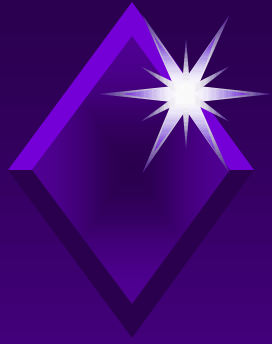
- ◆ Increased compliance by 50%
- ◆ Workshops are continuing
- ◆ Illinois EPA CFFP Program ecstatic with our assistance as they have limited resources
- ◆ Private Industry complimentary of team work between agencies
- ◆ Field Inspectors are receiving training which may not have otherwise been offered



## *Annual Emission Report 1998*

- ◆ Chronic problems with short form filers
- ◆ Annual Emission Report were due May 1
- ◆ SBAP became involved in September
- ◆ 372 had not responded to previous mailings
- ◆ Non Compliance Advisories had gone out from enforcement section





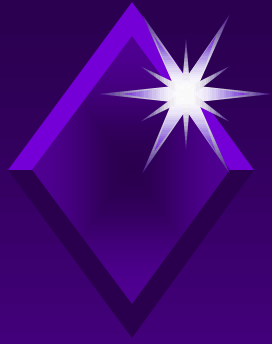
## *SBAP Annual Emission Report Initiative 1998*

- ◆ Personalized letter to companies identified
- ◆ Enclosed company report form and instructions
- ◆ Good Guy/ Bad Cop Approach
- ◆ Gave deadline for action
- ◆ Developed spreadsheets to calculate emissions for common sources (Web site)



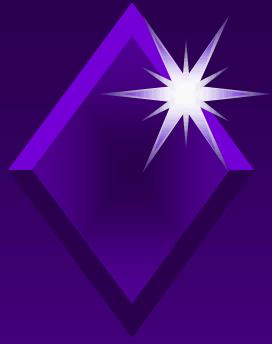
# *Annual Emission Report Summary 1998*

- ◆ Compliance increased by 44 %
- ◆ Led to more proactive approach for 1999 incorporating the SBAP
- ◆ Gained respect of compliance assurance section (enforcement)
- ◆ Again helped a program with limited staff and resources



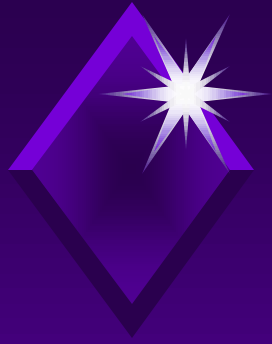
## *Annual Emission Report Initiative 1999*

- ◆ EPA & SBAP began planning early
- ◆ SBAP Involved before May 1 Deadline
- ◆ Reminder postcard of deadline in Feb.
- ◆ SBAP Helpline available to take calls
- ◆ Increased compliance to 900 companies out of compliance (down from 1800 last year)
- ◆ Forget Something? Post Card went out June 7



# *Annual Emissions Report Initiative Activities to Come*

- ◆ Good Guy/ Bad Cop Approach (July)
- ◆ Personalized letter indicating timeline for enforcement and they are on list
- ◆ Copy of their forms and instructions
- ◆ Joint survey of companies to determine internet capabilities to move to electronic forms and instructions
- ◆ Exploring joint workshops for Spring 2001



# *SBAP Language in Non Compliance Advisory Letters*

- ◆ Issued by Field Inspectors & Compliance Assurance Section
  - ◆ Inform companies of violations
  - ◆ List violations w/ little direction



## NCA Language

The State of Illinois offers voluntary programs to help small businesses understand their environmental requirements. Businesses seeking further information about environmental rules and regulations may contact the following programs:

Illinois Small Business Environmental Assistance Program

Department of Commerce & Community Affairs

620 East Adams Street

Springfield, IL 62701

800/252-3998 (Toll Free)

-or-

Office of Small Business

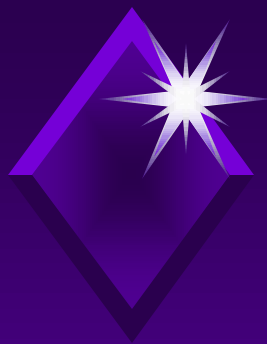
Illinois Environmental Protection Agency

1021 N. Grand Ave. East

P.O. Box 19276

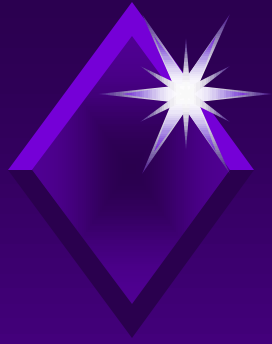
Springfield, IL 62794

888/372-1996 (Toll Free)



## *2001 Projects*

- ◆ Boiler Initiative
- ◆ General Lifetime Permits:
  - ◆ Concrete Batch Plant
  - ◆ Asphalt Plants
- ◆ Asbestos Training:
  - ◆ General Contractors
  - ◆ Local Officials
- ◆ Petroleum Dry Cleaners
- ◆ Incinerators
- ◆ Coatings
- ◆ Open Burning Factsheets
- ◆ and MORE.....



## *Working with Enforcement*

- ◆ Measure outcomes to prove your value
- ◆ Build on each program's strengths
- ◆ Develop a mutual workplan
- ◆ You have a mutual goal:

IMPROVING COMPLIANCE